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Attorneys for Plaintiff
Bird B. Gone Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BIRD B. GONE INC., a California
Corporation,

Plaintiff,

v.

HAIERC INDUSTRY CO., LTD., an alien,

Defendant.

Case No. 2:18-cv-00819-APG-NJK

**STIPULATION [AND ~~PROPOSED~~
ORDER] REGARDING EXTENSION OF
TIME TO FILE RESPONSE TO
COMPLAINT**

(FIRST REQUEST)

COMES NOW, Plaintiff Bird-B-Gone, Inc. (hereinafter “BBG” or “Plaintiff”), by and through its counsel of record, and Defendant Haierc Industry Co., Ltd., (hereinafter referred to as “HIC” or “Defendant”), *pro se*, and, pursuant to LR IA 6-1 and hereby stipulate and agree to the following:

1. Plaintiff filed its Complaint in this matter on May 8, 2018 and a summons was issued to Defendant on the same date.
2. Plaintiff served Defendant Haierc Industry Co., Ltd., by personal service on May 8, 2018, making Defendant's current deadline to respond to Plaintiff's Complaint May 29, 2018.
3. Defendant has requested a fourteen (14) day extension of time to file a response to Plaintiff's Complaint, in order to accommodate the parties' ongoing discussions regarding a potential extrajudicial resolution of this matter, as well as to permit Defendant, an alien, to potentially obtain local counsel, and Plaintiff has agreed to the requested extension.
4. This is the parties' first such request for an extension of time for Defendant to respond to the Complaint.

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1 5. It is therefore stipulated by and the between the parties that Defendant shall have
2 until June 12, 2018, to file a response to Plaintiff's Complaint.
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4 Dated: May 21, 2018

5 /s/ Ismail Amin, Esq.

6 Ismail Amin, Esq.
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25 *Attorneys for Plaintiff Bird-B-Gone, Inc.*
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Dated: May 24, 2018

/s/

Haier Chen (General Manager)
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For and on behalf of
Defendant Haierc Industry Co., Limited
海盛实业有限公司

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE
DATED: May 22, 2018